



Helen F. Dalton & Associates, P.C.

ATTORNEYS AT LAW

69-12 Austin Street, Forest Hills, NY 11375 • Tel.: 718-263-9591 • Fax: 718-263-9598

December 2, 2016

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square, Courtroom 518
New York, NY 10007

Re: Miranda, et al. v. Grace Farms, Inc. d/b/a City Café, et al.
Docket No.: 16-CV-1369 (VSB)

Dear Judge Broderick:

We represent the Plaintiffs in the above-referenced matter ("*Miranda*") and submit this letter with respect to the potential consolidation of this matter with the matter entitled *Amaro, et al. v. Unak Grocery Corp., et al.* bearing Docket No. 16-CV-7704 ("*Amaro*").

We submit this letter in support of the potential consolidation of the *Miranda* and *Amaro* matters. We believe that the actions are sufficiently similar and warrant consolidation under FRCP Rule 42 and the relevant case law.

We thank Your Honor for his consideration on this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Roman Avshalumov".

Roman Avshalumov, Esq.